



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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Mary A. Gade, Director

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Refer to: L1630200005 -- St. Clair County
Sauget Area 1 Sites - Sauget
Superfund/Technical Reports

December 17, 1998

Mr. Michael McAteer
Remedial Project Manager
U.S. EPA Region 5, SR-6J
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

Dear Mike:

As requested, the Illinois Environmental Protection Agency (Illinois EPA) has reviewed Solutia's November 19, 1998 Statement of Work (SOW) for an Engineering Evaluation/Cost Analysis and streamlined Remedial Investigation for the Sauget Area 1 Site. This SOW was submitted as the good faith response to U.S. EPA's request for investigatory work at this site. Illinois EPA had earlier submitted comments to U.S. EPA regarding a draft version of this document on November 13, 1998. Most of the comments presented here will elaborate on those that were presented to U.S. EPA on November 13th since this document hasn't changed much. Although I am aware that Solutia is now proposing an alternative to having detailed sampling information made part of the AOC, I strongly advise U.S. EPA to keep the content of the approved SOW flexible. Illinois EPA consequently believes that the "shifting" of the technical details as proposed in the draft good faith response to an appendix (Attachment B - "Support Sampling Plan") would still unreasonably inhibit U.S. EPA's ability to get Solutia to define the nature and extent of contamination at the Sauget Area 1 Site. In addition, Illinois EPA strongly believes that the work Solutia intends to perform in these investigations is inadequate.

In Section 3.2.3 (Soils and Sediments) of the SOW, it is unclear as to what is meant by "open areas." Also, it goes without saying that residential sampling needs to be performed. I realize that it will be difficult to conclude which contamination is site-related and which is facility-related, but Illinois EPA has proposed many times in the past that in-depth background sampling be performed to make this determination. The nature and extent of contamination cannot be determined without residential sampling, nor can a remedy that guarantees the protection of human health be selected without this sampling. It would be a mistake to make residential sampling contingent on the results of this proposed "open/commercial" sampling event if it can (or will) be argued that contamination found in those areas is not site-related. The additional remedies Solutia listed at the end of Section 4 of the SOW (Identification and

The additional remedies Solutia listed at the end of Section 4 of the SOW (Identification and Analysis of Removal Action Alternatives) are considered over the course of the normal remedy review process. The language U.S. EPA included "but not limited to" should take care of any unnecessary need to list additional remedies Solutia has proposed here.

The following comments relate to Attachment B:

The focus of the waste characterization section (Section 3.1) should be to confirm that the nature of source area contamination is essentially the same as it was determined in the scoring package. One sample location per site is not adequate to confirm this, especially in light of new data that has been collected around Site G and the fact that most of Site N and its adjacent properties formerly owned by Leo Sauget have not been investigated. It also is obvious that this section should include pesticide/PCB, cyanide and dioxin sampling since all of these compounds have been attributed to the site. This section should clearly lay out the rationale of how the extent of contamination (landfill boundaries) will be determined. Solutia has proposed test trenches to evaluate the "extent of cover over fill areas" to accomplish this. The performance of test trenches seems to be more appropriate to define the nature of contamination and to yield potential enforcement information rather than to determine the landfill boundaries. In addition, I am not optimistic that a credible waste volume determination can be made with the work that has been proposed in this section. The "Buried Drum and Tank Identification" part of this section does not specify how many test trenches will be performed.

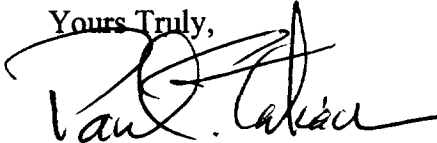
The hydrogeology section should begin with an evaluation of which existing groundwater monitoring wells could be utilized for sampling. Regarding the groundwater sampling plan, I am completely unconvinced that this proposal will define the nature and extent of groundwater contamination. No groundwater analytical work is proposed for Site N (but slug tests, grain size analyses and air sampling are). Not a single monitoring well installation or sampling of existing monitoring wells have been proposed anywhere in this document. No alternate methods for groundwater sampling are proposed if push sampling technologies are unsuccessful. Only two bedrock groundwater samples are proposed in the bedrock. The proposal acknowledges that the discharge point of groundwater contamination is the Mississippi River, but no sampling is proposed between Route 3 and the river. Pesticide/PCB and cyanide sampling in groundwater should be proposed because these contaminants have previously shown up in groundwater.

Regarding Section 3.2.3 (Soils and Sediments), it seems that sampling of soils in commercial/open areas referenced in the SOW has become sampling of "residential and commercial areas" in Attachment B - which is it and why isn't pesticide/PCB sampling proposed? While Solutia has proposed 80 samples in Dead Creek, U.S. EPA should evaluate whether the abbreviated list of contaminants (which includes PCBs) to be sampled for is adequate since other compounds have been found in sediments that are not listed here. I would argue that samples taken every 200 feet without any mention of vertical profiling are still not adequate to determine a contaminant volume estimate.

It is not clear what is meant in the end of Section 3.2.5 (Surface Water) by sampling at a depth of "0.6 of the water column".

I would like to reiterate that all of the comments in Illinois EPA's November 13th letter are still valid. If you have any questions about this letter or Illinois EPA's position on this SOW, please let me know.

Yours Truly,

A handwritten signature in black ink, appearing to read "Paul E. Takács", written over the words "Yours Truly,".

Paul E. Takács, Project Manager
National Priorities Unit
Division of Remediation Management
Bureau of Land

cc: Tom Martin, U.S. EPA
Terry Ayers
Clarence Smith
Chris Perzan
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